

Dan Booth Law LLC  
60 Thoreau Street #121  
Concord, MA 01742



# STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES RENDERED

Date: September 9, 2019  
Client: Consequence Holdings LLC  
Matter: Ward v. Consequence Holdings LLC  
For: Legal Services Rendered Through September 9, 2019

Date	Hours	Description of Legal Services
8/01/19	0.2	emails with AY re service and communications with RL
	0.1	review docket
	0.2	review S.D. Ill. local rules
	0.4	draft Rule 68 letter for AY to send to RL
	6.1	begin draft memo ISO motion to set aside - introduction, background section, begin good cause section
8/2/19	0.6	legal research re Rule 55 cases in Seventh Circuit,
	0.5	legal research re DMCA removal, double-scienter
	8.2	draft memo ISO motion to set aside
	0.7	draft Young declaration
	0.3	draft Booth declaration
	0.2	prepare exhibits for declarations
	0.2	draft motion to set aside
	0.3	draft notice of appearance and motion for leave to appear PHV
	0.3	file via ECF: appearance, PHV motion, motion to set aside, memo with declarations and exhibits
8/3/19	3.0	draft response in opposition to motion for default judgment
	0.1	file response to motion for default judgment
8/19/19	0.1	review order setting aside default
	0.4	emails with clients re RL missed deadlines to oppose motion to set aside, order setting aside default, Rule 68 offer
	0.2	draft Rule 68 offer
	0.3	emails with RL re dismissal or transfer, Rule 68 offer
8/28/19	0.1	review NDIL Liebowitz cases
	0.3	research prior uses of Shmurda photo
	0.3	emails with client re NDIL Liebowitz cases and SDIL/NDIL strategy
8/29/19	2.0	draft motion to dismiss/fact section
	0.5	research Seventh Circuit precedent for 12(b)(2)/12(b)(3)
	0.8	research Seventh Circuit precedent re Section 1927 & inherent authority sanctions
	0.4	draft legal standards section
	1.1	draft opening and argument introduction
8/30/19	4.2	draft motion to dismiss argument section
	1.9	draft Section 1927 argument section re improper venue

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9/3/19	2.2	draft Section 1927 argument section re bad faith litigation conduct
	2.3	research and draft Section 1927 argument section re Liebowitz litigation
9/4/19	4.0	draft Section 1927 argument re application of statute/precedent
9/5/19	0.4	research Liebowitz prior venue transfer cases
	2.4	research and draft argument re propriety of fees and costs requested
	1.4	revise motion to dismiss/Section 1927 motion
9/6/19	1.3	draft declaration in support of motion
	0.3	emails with client re motion to dismiss/Section 1927 motion
	0.6	revise motion to dismiss/Section 1927 motion
9/9/19	<u>0.2</u>	file motion to dismiss/Section 1927 motion and supporting documents
	49.5	

Dan Booth hours	49.50
Hourly rate	\$ <u>425.00</u>
Attorney services	\$ 21,037.50

#### Additional Expenses

10/25/18	USPS/First class certified mail to Liebowitz	\$ 7.76
08/01/19	Lexis/monthly legal research	\$ 10.00
	PACER/docket and default filings, Mango	\$ 0.70
	ILSD/Pay.gov fee for pro hac vice admission	\$ 200.00
08/02/19	PACER/entry of default, Geerds	\$ 1.60
08/29/19	PACER/other S.D. Ill. Liebowitz cases	\$ 1.00
09/01/19	Lexis/monthly legal research	\$ 10.00
09/03/19	PACER/docket & default judgment filings	\$ 1.40
09/04/19	PACER/Pena, other venue cases	\$ 1.70
09/05/19	PACER/ other N.D. Ill. Liebowitz cases	\$ <u>0.80</u>
Expenses		\$ 234.96

#### Total

Attorney services	\$ 21,037.50
Expenses	\$ <u>234.96</u>
Total	\$ 21,272.46